



From: [Tom McCombs](#)
To: [Smith, Stefanie](#)
Subject: [External] Proposed amendments to Chapter 59a
Date: Saturday, July 13, 2024 8:55:42 PM

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Dear Ms. Smith, looking over the proposed updates to Chapter 59, I have a concern regarding 59a.6 weigher and samplers, copy below. I feel that to a keep standard Chapter 59a needs to follow the PMO Appendix B on weigher and samplers. Requiring weigher and samplers be certified every 2 years.

5. Add subsection (e), regarding duration of certificate; renewal, which establishes that certificates expire January 1 of each calendar year. Paragraph (1) requires that applicants apply or reapply for a certificate by December 31 of the proceeding calendar year and paragraph (2) requires the applicant to provide verification of compliance with the continuing education requirements of the regulation.

6. Add subsection (f), regarding continuing education and recertification requirements, which requires continuing education for certified samplers and weigher/samplers. Paragraph (1) establishes that a prerequisite to renewal of certification as a sampler or weigher/sampler is that the applicant attend a Department or Department-approved continuing education training course that meets the requirements established in Appendix B of the Grade "A" PMO. Paragraph (2) requires applicants to demonstrate proper sampling techniques to the Department every 24 months. This subsection is intended to help ensure all samplers and weigher/samplers have up-to-date training and remain competent in the necessary skills to carry out their jobs.

Also, Chapter 59a .110

2. In accordance with changes requested by the regulated community, the Department proposes to reduce the somatic cells per millimeter from 750,000 to 500,000. The industry is already requiring these lower counts from their producers: the lower somatic cell counts make the milk easier to pasteurize and process and help to ensure a safer raw milk product.

Once again I feel these standards should be the same as the PMO for standardization throughout the Industry.

Thanks, Tom McCombs

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